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Attorney for Plaintiff Susan McShannock

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

Susan McShannock, as Executrix of the
Estate of Patricia Blaskower, on behalf of
the Estate of Patricia Blaskower and all
others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A. dba Chase
Bank,

Defendant.

Case No. 3:18-cv-01873-EMC

Monica Chandler as Trustee of the
Chandler Family Trust, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.; and DOES
1 through 10, inclusive,

Defendant.

Case No. 3:18-cv-02735-EMC

**STIPULATION AND ~~PROPOSED~~ ORDER
CONSOLIDATING CASES FOR ALL
PURPOSES AND PERMITTING FILING OF
CONSOLIDATED COMPLAINT**

1 This Stipulation is entered into by plaintiffs Susan McShannock, as Executrix of the Estate of
2 Patricia Blaskower, and Monica Chandler, as trustee of the Chandler Family Trust, (collectively
3 “Plaintiffs”), and defendant JPMorgan Chase Bank, N.A. by and through their respective counsel;

4 WHEREAS, the *McShannock* complaint was filed on March 27, 2018;

5 WHEREAS, the *Chandler* complaint was filed on May 9, 2018;

6 WHEREAS, Plaintiffs have served Defendant in both actions;

7 WHEREAS, Defendant filed a motion to dismiss the complaint in the *McShannock* case on
8 May 21, 2018;

9 WHEREAS counsel for the parties have conferred, and the parties are in agreement that the
10 *Chandler* action should be consolidated with the *McShannock* action for all purposes because the
11 cases involve similar complaints and common questions of law or fact, and because consolidation
12 would advance the interests of judicial economy; and

13 WHEREAS, Plaintiffs intend to file a consolidated complaint, once the cases are
14 consolidated.

15 **IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel
16 for Plaintiffs and Defendant that:

17 1. The Court has ruled that the following are related cases within the meaning of Local
18 Civil Rule 3-12(a):

19 a. *Susan McShannock, v. JPMorgan Chase Bank, N.A.*, Case No. 3:18-cv-01873-
20 EMC; and

21 b. *Monica Chandler v. JPMorgan Chase Bank, N.A.*, Case No. 3:18-cv-02735-
22 EMC.

23 2. Pursuant to Federal Rule of Civil Procedure 42(a)(2), the above-captioned actions are
24 hereby consolidated for all purposes into one action.

25 3. These actions shall be referred to here as the “Consolidated Actions.” The Master
26 Docket and Master File for the Consolidated Actions shall be Civil Action No. 3:18-cv-01873-EMC.

27 4. Upon consolidation of these actions, the Clerk shall administratively close Case No.
28 3:18-cv-02735-EMC.

1 5. Every pleading in the Consolidated Actions shall bear the following caption:

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF CALIFORNIA

4 _____))
5 IN RE JPMORGAN CHASE ESCROW INTEREST CASES) Case No. 3:18-cv-01873

6 _____))
7 6. Defendant has no obligation to respond to the current Complaints. Defendant's
8 motion to dismiss the *McShannock* Complaint shall be taken off calendar as moot. The case
9 management conference currently scheduled for June 28, 2018 shall be rescheduled to another date
10 convenient for the Court.

11 7. The Plaintiffs shall file a Consolidated Complaint on or before July 2, 2018.
12 Defendant shall respond to the Consolidated Complaint on or before August 2, 2018.

13 This stipulation is without prejudice to any other rights that any party may have.

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DATED: June 4, 2018

By: /s/ Michael F. Ram
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Attorneys for Plaintiff Monica Chandler

1 DATED: June 4, 2018

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510-452-2610

Attorney for Plaintiff Susan McShannock

6 DATED: June 4, 2018

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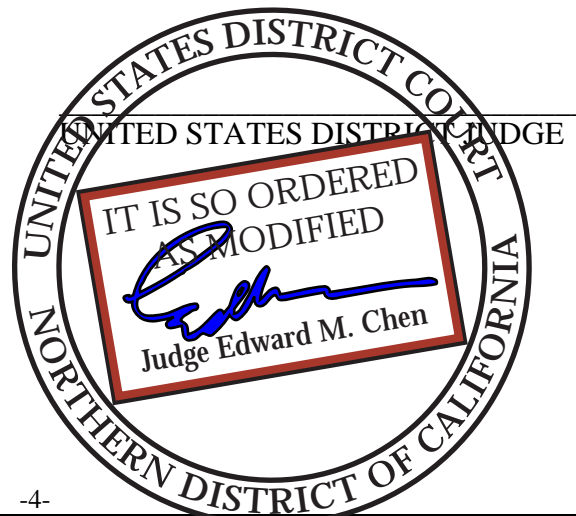
17 **[~~PROPOSED~~] ORDER**

18 The above stipulation having been considered and good cause appearing therefore,

19 **IT IS SO ORDERED.**

C18-1873 EMC and C18-2735 EMC are consolidated. All future
filings shall be filed under C18-1873 EMC. 6/13/18 CMC is
reset to 9/6/18 at 9:30 a.m. Joint CMC statement due
8/30/18.

22 DATED: 6/5/18



1 **FILER'S ATTESTATION**

2 Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that
3 all parties have concurred in the filing of this Stipulation and [Proposed] Order Consolidating Cases
4 for All Purposes and Permitting Filing of Consolidated Complaint.

5 This the 4th day of June, 2018.

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8 By: /s/ David C. Powell
9 David C. Powell
10 Attorney for JPMorgan Chase Bank, N.A.
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on June 4, 2018, a copy of the foregoing pleading was filed
3 electronically with the clerk of court via ECF, which will serve all counsel of record, and served via
4 First-Class Mail to any party not filing ECF, postage prepaid.

5
6 This the 4th day of June, 2018.

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8 By: /s/ David C. Powell
9 David C. Powell
10 Attorney for JPMorgan Chase Bank, N.A.
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